

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

CHARITY CHIDINMA)
EMERONYE SWIFT,)
Plaintiff,)
v.) Civil Action No.: 1:14-cv-001139-LO-IDD
FRONTIER AIRLINES, INC., et al.,)
Defendants.)

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND
TO PLAINTIFF'S COMPLAINT**

Defendant Frontier Airlines, Inc. (“Defendant”), by undersigned counsel, moves this Court for an extension of time to respond to the *pro se* Plaintiff Charity Chidinma Emeronye Swift’s (“Plaintiff”) Complaint in this matter. In support of this motion, the Defendant states:

1. Plaintiff filed the above titled matter with this Court on September 4, 2014, alleging that the Defendant and a Jane Doe discriminated against her on the basis of “her perceived race, color, ethnicity, alienage, ancestry, and/or national origin” by requiring her to pay twenty-five dollars (\$25.00) for her carry-on baggage and purportedly threatening to call security when she failed to comply. (Complaint ¶¶ 1, 33, 42.) Plaintiff asserts claims under 42 U.S.C. § 1981 as amended by the Civil Rights Act of 1991, Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, and for intentional infliction of emotional distress and defamation. (Complaint ¶ 1.)

2. Defendant was served on September 17, 2014. Pursuant to Rule 12(a) of the Federal Rules of Civil Procedure, responsive pleadings are due by October 8, 2014.

3. A pretrial conference has not yet been set in this matter.

4. Defendant is investigating the serious allegations contained in the Complaint, and it requires additional time to adequately prepare a response to those allegations.

5. Accordingly, Defendant moves for a 14-day extension of time to respond to Plaintiff's Complaint, up to and including, Wednesday, October 22, 2014. This brief extension will not prejudice any party or any other deadlines in this case.

6. On October 6, 2014, Defendant's counsel contacted Plaintiff to request her consent to the motion. She stated that she does not object to this motion or the relief sought herein.

WHEREFORE, for the foregoing reasons and for good cause shown, Defendant respectfully requests that the Court grant this Motion and issue an Order extending its time to respond to the Complaint up to and including Wednesday, October 22, 2014.

Dated: October 8, 2014

Respectfully submitted,

/s/
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- and -

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Attorneys for Frontier Airlines, Inc.

CERTIFICATE OF SERVICE

I hereby certify that, on October 8, 2014, I served the following via U.S. Mail, postage prepaid, and via electronic case filing:

Charity Chidinma Emeronye Swift
Swift & Swift, Attorneys at Law, P.L.L.C.
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Alexandria, VA 22314

/s/
Sarah E. Moffett